

Supporting Statement A
Disclosure of Seat Dimensions to Facilitate the Use of Child Safety Seats
on Airplanes During Passenger-Carrying Operations

OMB Control No. 2120-0760

Summary of Changes:

- Many of the previous charts/tables related to this original collection were removed because they are no longer applicable.
- The numbers of carriers was updated with current numbers.
- The wages were updated to the 2021 wage rates found on the Bureau of Labor Statistics webpage.
- The collection is divided into 3 groups: new collections, verification of existing data, and updates to existing data due to revised equipment.

1. Explain the circumstances that make the collection of information necessary. Identify any legal or administrative requirements that necessitate the collection.

Section 412 of the FAA Modernization and Reform Act of 2012 (Public Law 112-95) specifically required the Federal Aviation Administration (FAA) to conduct rulemaking, “[T]o require each air carrier operating under part 121 of title 14, Code of Federal Regulations, to post on the Internet Web site of the air carrier the maximum dimensions of a child safety seat that can be used on each aircraft operated by the air carrier to enable passengers to determine which child safety seats can be used on those aircraft.” The rule, § 121.311(k), necessitates this collection of information, and specifically, this information collection renewal. This is the information collection’s second renewal.

2. Indicate how, by whom, and for what purpose the information is to be used. Except for a new collection, indicate the actual use the agency has made of the information received from the current collection.

Passenger-carrying air carriers must comply with this regulation and, thus, this information collection, which requires passenger-carrying air carriers to make available on their Internet Web sites the width of the narrowest and widest passenger seats in each class of service for each make, model, and series of airplane used in passenger-carrying operations. This information helps to facilitate the use of child restraint systems (CRS) onboard airplanes by providing greater information to caregivers to help them determine whether a particular CRS will fit in an airplane seat. Compliance with this rule was required February 29, 2016. Affected air carriers initially provided information on their Internet Web sites in order to comply with the regulation. After initial implementation, the only times air carriers need to update their Internet Web sites are on occasion that a new airplane make, model, or series is introduced to its fleet, or when the narrowest or widest seat in a class of service in a currently listed make,

model, or series of airplane is replaced with a narrower or wider seat. Failure to update an Internet Web site when an air carrier adds a new aircraft make, model, or series to its fleet or replaces an existing aircraft's seats with a different model would result in non-compliance with the regulatory information disclosure requirements. Failure to review the accuracy of the information on an annual basis could result in the air carrier's display of incorrect seat dimension information.

The information required by this collection, Disclosure of Seat Dimensions to Facilitate the Use of Child Safety Seats on Airplanes During Passenger-Carrying Operations, is made available to the public for the public's use. No other information is collected or disseminated to the public. This collection contains disclosure requirements.

3. Describe whether, and to what extent, the collection of information involves the use of automated, electronic, mechanical, or other technological collection techniques or other forms of information technology.

Section 412 of Public Law 112-95 requires that all air carriers provide this required information on their Internet Web sites. Therefore, this information collection is 100% electronic. The Internet provides this information to the public. There are no forms associated with this collection.

4. Describe efforts to identify duplication. Show specifically why any similar information already available cannot be used or modified for use for the purposes described in Item 2 above.

The FAA is the only Federal agency that requires this information to be provided to the public. This information disclosure is a result of a mandate in Public Law 112-95 for the FAA to conduct rulemaking. The FAA has also reviewed other FAA information disclosure requirements and has found no duplication. Therefore, this information collection renewal does not duplicate any other requirements.

5. If the collection of information involves small businesses or other small entities, describe the methods used to minimize burden.

At the time of this original information collection approval, the Small Business Administration small entity size standard for air carriers was 1,500 employees or less. Of the 58 part 121 air carriers to whom this information collection initially applied, 23 were classified as large entities and 27 as small entities. Employment statistics for the eight remaining air carriers were not available; however, for purposes of the regulatory flexibility analysis of the final rule, it was assumed that these eight air carriers were small entities (for a total of 35 small entities).

The FAA reports there to be 64 part 121 air carriers to whom this information collection still applies.¹ However, this collection impacts only 44 of the 64 air carriers. Excluded from this collection are 19 cargo carriers and one air carrier that does not have an

¹ FAA data from Q4, FY 2021.

Internet Web site (air carriers that do not have Internet Web sites do not need to comply with this collection). Of the 44 part 121 air carriers impacted by this collection, 22 are classified as small entities.

As stated in the Regulatory Flexibility Act analysis for the final rule that authorized this information collection, the head of the FAA expects that the disclosure requirements of this information collection to not result in a significant economic impact on a substantial number of small entities.

6. Describe the consequence to Federal program or policy activities if the collection is not conducted or is conducted less frequently, as well as any technical or legal obstacles to reducing burden.

The vast majority of this burden occurred on a one-time basis as air carriers initially provided information on their Internet Web sites in order to comply with the regulation. After initial implementation, the only time air carriers need to update their Internet Web sites is when an air carrier introduces a new airplane make, model, or series to its fleet, or when a narrower or wider seat replaces the narrowest or widest seat in a class of service in a currently listed make, model, or series of airplane. Failure to update an Internet Web site when an air carrier adds a new aircraft make, model, or series to its fleet or replaces an existing aircraft's seats with a different model would result in non-compliance with the regulatory information disclosure requirements. Failure to review the accuracy of the information on an annual basis could result in the air carrier's display of incorrect seat dimension information.

7. Explain any special circumstances that would cause an information collection to be conducted in a manner:

- *requiring respondents to report information to the agency more often than quarterly;*
- *requiring respondents to prepare a written response to a collection of information in fewer than 30 days after receipt of it;*
- *requiring respondents to submit more than an original and two copies of any document; requiring respondents to retain records, other than health, medical, government contract, grant-in-aid, or tax records, for more than three years;*
- *in connection with a statistical survey, that is not designed to produce valid and reliable results that can be generalized to the universe of study;*
- *requiring the use of a statistical data classification that has not been reviewed and approved by OMB;*
- *that includes a pledge of confidentiality that is not supported by authority established in statute or regulation, that is not supported by disclosure and*

data security policies that are consistent with the pledge, or which unnecessarily impedes sharing of data with other agencies for compatible confidential use; or

- *requiring respondents to submit proprietary trade secrets, or other confidential information unless the agency can demonstrate that it has instituted procedures to protect the information's confidentiality to the extent permitted by law.*

There are no special circumstances associated with this information collection.

8. Provide information on the PRA Federal Register Notice that solicited public comments on the information collection prior to this submission. Summarize the public comments received in response to that notice and describe the actions taken by the agency in response to those comments. Describe the efforts to consult with persons outside the agency to obtain their views on the availability of data, frequency of collection, the clarity of instructions and recordkeeping, disclosure, or reporting format (if any), and on the data elements to be recorded, disclosed, or reported.

A Federal Register Notice published on September 21, 2021 (86 FR 52544) solicited public comment. No comments were received.

Certificate holders who are required to comply with this collection have the opportunity to engage with the FAA through their Certificate Management Offices or Teams. They routinely communicate and offer feedback to the FAA through these channels.

9. Explain any decisions to provide payments or gifts to respondents, other than remuneration of contractors or grantees.

The FAA provided no payments or gifts to respondents.

10. Describe any assurance of confidentiality provided to respondents and the basis for assurance in statute, regulation, or agency policy.

This information collection provides no assurances of confidentiality.

11. Provide additional justification for any questions of a sensitive nature, such as sexual behavior and attitudes, religious beliefs, and other matters that are commonly considered private.

This information collection does not include any questions of a sensitive nature.

12. Provide estimates of the hour burden of the collection of information. The statement should:

This collection requires Part 121 passenger-carrying air carriers to post seat dimension information to their Internet Web sites and to revise the data periodically. This requirement, however, excludes air carriers that do not have Internet Web sites. Currently, only 1 air carrier does not have an Internet Web Site. There are currently 44 Part 121 airlines that fall under this rule.

Affected air carriers initially provided information on their Internet Web sites in order to comply with the regulation, so there was an initial cost burden for air carriers to comply with the seat dimension disclosure rule. Currently, local Flight Standards District Office assigned certificate responsibilities guide applicants for operating certificates through the administrative requirements of Part 121. Therefore, there is not an additional cost burden associated with initial compliance with this rule, since applicants must show compliance with the rule during certification. However, there would be an additional cost requirement for the one carrier who is already certificated but does not have a website. If they were to develop a website, they would be required to post seat dimensions on the internet. Therefore, we have calculated a cost below should they decide to develop a website.

After initial implementation, air carriers must update their Internet Web sites when introducing a new airplane make, model, or series to its fleet, or when air carriers replace the narrowest or widest seat in a class of service in a currently listed make, model, or series of airplane with a narrower or wider seat.

Employee wages to complete this collection were based on Table 1 below:

**Table 1
Assumptions: Hourly Wage and Benefits Compensation**

NAICS**	Job Series	Job Category	Job Title	Hourly Wage	Benefits ²	Overhead Costs ³	Total Hourly Compensation
481100 Scheduled Air Transportation	15-1244	Staff	Database and System Administrators and Network Architects	\$43.01 ⁴	\$13.51	\$7.31	\$63.83

² <https://www.bls.gov/news.release/ecec.nr0.htm>

³ Source: Cody Rice, U.S. Environmental Protection Agency, “Wage Rates for Economic Analyses of the Toxics Release Inventory Program” (June 10, 2002), <https://www.regulations.gov/document?D=EPA-HQ-OPPT-2014-0650-0005>

⁴ <https://www.bls.gov/oes/current/oes151244.htm>

	11-3021	Mgmt.	Computer and Information System Managers	\$77.76 ⁵	\$24.42	\$13.21	\$115.39
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New Collection:

Currently one existing, passenger-carrying operator does not have a website. If they were to develop a website, they would be required to post seat dimensions. Therefore, we will calculate a one-time cost during this collection period of this carrier posting seat dimensions to their website. We estimate that it would take this carrier approximately 9 staff hours and 2 management hours to research and post this information on the website. Therefore, the cost of the staff hours would be \$574.47 and the cost of management hours would be \$230.78. The total cost associated with a new collection would be \$805.25.

Summary (Annual numbers)	Reporting	Recordkeeping	Disclosure
# of Respondents			1
# of Responses per respondent			1
Time per Response			11 Hours
Total # of responses			1
Total burden (hours)			11 Hours

Verification of Seat Dimension Data:

Once a carrier posts their seat dimension data to their website, they will need to periodically verify the validity of the data to ensure any changes that occurred to seat dimension have been captured on the website. We estimate that the 44 Part 121 carriers will complete this verification once a year. We estimate that it will take 6 staff

⁵ <https://www.bls.gov/oes/current/oes113021.htm>

hours and 1 management hour to review the data. The total annual hours burden is 308 hours, as indicated by Table 3. The total staff cost burden is \$16,851.12, and the total management cost burden is \$5,077.16. The total cost burden is \$21,928.28.

Summary (Annual numbers)	Reportin g	Recordkeepin g	Disclosur e
# of Respondents			44
# of Responses per respondent			1
Time per Response			7 Hours
Total # of responses			44
Total burden (hours)			308 Hours

Changes to Seat Dimension Data:

The FAA estimates that approximately 4 carriers will need to change the seat data on their website for one of their fleets during a year’s time. We estimate that it will take 1 staff hour and 1 management hour to update the data on their website. The total annual hours burden will be 8 hours, as indicated by Table 4. The total staff cost burden is \$255.32, and the total management cost burden is \$461.56. The total cost burden is \$716.88.

Summary (Annual numbers)	Reportin g	Recordkeepin g	Disclosur e
# of Respondents			4
# of Responses per respondent			1
Time per Response			2 Hours
Total # of responses			4
Total burden (hours)			8 Hours

Total Costs:

Title	Hours	Cost
New Collection	11 Hours	\$805.25
Verification of Seat Dimension Data	308 Hours	\$21,928.28
Changes to Seat Dimension Data	8 Hours	\$716.88
Total:	327 Hours	\$23,450.41

The total cost of this entire collection is 327 hours and \$23,450.41.

13. Provide an estimate for the total annual cost burden to respondents or record keepers resulting from the collection of information.

No cost other than those in question 12.

14. Provide estimates of annualized costs to the Federal government. Also, provide a description of the method used to estimate cost, which should include quantification of hours, operational expenses (such as equipment, overhead, printing, and support staff), and any other expense that would not have been incurred without this collection of information.

The FAA estimates no additional costs associated with this collection as the data gathered above is associated with normal job functions that an Aviation Safety Inspector would perform. Therefore, the costs would already be included in the salary that they receive.

15. Explain the reasons for any program changes or adjustments.

Many of the old charts related to this original collection were taken out as they do not pertain now that this rule is in effect. Also, the numbers of carriers was updated with current numbers. The wages were updated to the 2021 wage rates found on the Bureau of Labor Statistics webpage. The collection is divided into 3 groups: new collections, verification of existing data, and updates to existing data due to revised equipment.

16. For collections of information whose results will be published, outline plans for tabulation and publication. Address any complex analytical techniques that will be used. Provide the time schedule for the entire project, including beginning and ending dates of the collection of information, completion of report, publication dates, and other actions.

The FAA does not collect or publish data as part of this information collection. This information collection is a third-party disclosure by air carriers on their Internet Web sites.

17. If seeking approval to not display the expiration date for OMB approval of the information collection, explain the reasons why display would be inappropriate.

No such approval is sought because this information collection does not involve the use of a standard form to submit information to the agency.

18. Explain each exception to the topics of the certification statement identified in "Certification for Paperwork Reduction Act Submissions."

The agency certifies compliance with all provisions of the Paperwork Reduction Act. There are no exceptions.